

REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed April 20, 2004. Claims 1-17 remain pending in this application. Applicant respectfully requests reconsideration and favorable action in this case.

Drawing Objections

The drawings stand objected to as failing to adequately denote prior art. FIGURE 1 has been amended. Annotated Marked-up Drawings, concurrently submitted herewith, includes annotations to show the changes to the drawings more clearly.

More specifically, referring to FIGURE 1, the label has been amended to include the designation "Prior Art" as suggested by the Examiner. Accordingly, withdrawal of this objection is respectfully requested.

Specification Objections

The disclosure stands objected to for various informalities. The specification has been amended to address these informalities. Accordingly, withdrawal of this objection is respectfully requested.

Rejections under 35 U.S.C. § 102

Claims 1-5 and 10-17 stand rejected as anticipated by U.S. Patent No. 6,509,898 ("Chi"). Applicant respectfully traverses this rejection.

Claim 1, as recited, discloses a system for graphically displaying interaction data between items in a retail setting, including loading an interaction metric between items into memory, optimizing placement of nodes and edges pursuant to the interaction metric and generating a graphical representation of the nodes and edges with corresponding interaction metrics. Thus, the system of Claim 1 may optimize the placement of nodes representing the items, and edges between the nodes, pursuant to the interaction metric. This interaction metric, as recited, is between items, and may pertain to a relation of one item to another item.

A graphical representation of the nodes and edges (with corresponding interaction metrics) can then be generated.

In contrast, Chi discloses generating a tree representation of a generalized graph structure. A prime object of Chi is to display nodes of a web site in hierarchical order in a tree structure based upon usage. To accomplish this, Chi uses a usage parameter vector which in turn can be used to generate a tree representation of the graph corresponding with the usage of the nodes. This usage parameter vector is simply a list of usage parameters associated with each node of a generalized graph structure. The usage parameters in the usage parameter vector correspond to measured usages of the corresponding node, and a usage vector is computer for each node. (Col 9, Line 59 – Col. 6, Line 25) This usage information is then employed to make layout decisions about the various nodes. (Col. 8, Lines 26-45)

As Chi discloses utilizing a usage parameter computed for each node to determine the parent-child relationship in a tree, Chi does not disclose displaying interaction data between items, loading an interaction metric between items, optimizing placement of nodes and edges pursuant to the interaction metric or generating a graphical representation of the nodes and edges with corresponding interaction metrics as recited in Claim 1 and as asserted by the Examiner. Consequently, because Chi does not disclose every element of Claim 1, Applicant respectfully requests the withdrawal of the rejection of Claim 1. Additionally as Claims 2-5 and 10-12 depend from independent Claim 1, Applicant respectfully requests the withdrawal of the rejection of these Claims as well.

Furthermore, as Claim 13 contains limitations substantially similar to Claim 1, Applicant respectfully requests the withdrawal of the rejection of Independent Claim 13 and its respective dependent Claims 14-17.

Rejections under 35 U.S.C. § 103

Claims 6-9 stand rejected as obvious over U.S. Patent No. 6,509,898 (“Chi”) in view of U.S. Patent No. 6,144,962 (“Weinberg”). As Claims 6-9 depend from Claim 1, Applicant respectfully submits that the above arguments laid out with respect to Claim 1 apply equally well to the rejection of Claims 6-9. Therefore, Applicant respectfully requests the withdrawal of the rejection of Claims 6-9.

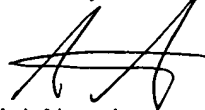
CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-17. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

Sprinkle IP Law Group
Attorneys for Applicant

A handwritten signature in black ink, appearing to read 'Ari Akmal', written over a horizontal line.

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